

EXHIBIT B

From: [Todd Logan](#)
To: [Menaldo, Nicola C. \(SEA\)](#); [O'Sullivan, Kathleen M. \(SEA\)](#)
Cc: [Rafey Balabanian](#); [Brandt Silver-Korn](#); [Cecily Shiel](#)
Subject: Re: Activity in Case 2:18-cv-00565-RBL Fife v. Scientific Games Corp Motion to Amend
Date: Wednesday, May 13, 2020 9:33:19 AM

Nicola and Katie:

I wanted to send a quick note of apology for not being able to provide you all advance notice on this motion. As we describe in the motion, this issue arose suddenly and unexpectedly. Our determination was (and remains) that, in the interests of transparency and efficiency (both for the parties and for the Court), the most important thing was to get the papers on file as quickly as possible before turning to "what's next."

Now, as to "what's next." We would prefer to obtain the relief sought by the motion--that is, substituting Ms. Reed in for Ms. Fife--through stipulation rather than through contested motion practice. With that interest in mind, we are open to providing a variety of concessions to smooth out the transition and otherwise make this litigation more efficient for your client. For example, we are willing to:

- Deem all RFP's previously served on Ms. Fife as having been served upon Ms. Reed as of the date of our agreement ("Effective Date")
- Commit to substantially completing responsive document production within 21 days of the Effective Date
- Deem all interrogatories served on Ms. Fife as having been served upon Ms. Reed the Effective Date
- Commit to substantially completing responses to those interrogatories within 21 days of the Effective Date
- Commit to obtaining and producing Ms. Reed's app download and transaction history information from Facebook, Apple, and Google (to be obtained via consumer-facing download portals we learned of during the course of third-party discovery) within 21 days of the Effective Date.
- Commit to limiting any pre-certification-motion depositions of Scientific Games and/or its representatives to a single 30b6 deposition conducted by video-conference.
- Refrain from serving any additional written discovery in advance of filing a class certification motion.

This is not intended to be an exhaustive list--to the extent there are other reasonable requests your client has, we're more than happy to consider. In any event, I look forward to hearing your views on the above, and please do let me know if it would be helpful to discuss by phone. Thanks.

Best,

Todd

On Tue, May 12, 2020 at 3:29 PM <ECF@wawd.uscourts.gov> wrote:

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U.S. District Court

United States District Court for the Western District of Washington

Notice of Electronic Filing

The following transaction was entered by Logan, Todd on 5/12/2020 at 3:28 PM PDT and filed on 5/12/2020

Case Name: Fife v. Scientific Games Corp

Case Number: [2:18-cv-00565-RBL](#)

Filer: Sheryl Fife

Document Number: [52](#)

Docket Text:

MOTION to Amend [1] Complaint, Motion for Leave to Amend and Substitute Donna Reed as Class Representative, filed by Plaintiff Sheryl Fife.

(Attachments: # (1) Exhibit 1 - Proposed FAC [Clean], # (2) Exhibit 2 - Proposed FAC [Redline], # (3) Proposed Order) Noting Date 5/29/2020, (Logan, Todd)

2:18-cv-00565-RBL Notice has been electronically mailed to:

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2:18-cv-00565-RBL Notice will not be electronically mailed to:

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1035929271 [Date=5/12/2020] [FileNumber=8042333-0]
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Document description: Exhibit 1 - Proposed FAC [Clean]

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1035929271 [Date=5/12/2020] [FileNumber=8042333-1]
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Document description: Exhibit 2 - Proposed FAC [Redline]

Original filename:n/a

Electronic document Stamp:

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Document description: Proposed Order

Original filename:n/a

Electronic document Stamp:

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